1 2 3 The Honorable Marsha J. Pechman 4 5 UNITED STATES DISTRICT COURT 6 WESTERN DISTRICT OF WASHINGTON 7 AT SEATTLE 8 SUKHMINDER KAUR and SARTAJ SINGH NO. 2:20-cv-00384-MJP 9 SOHI, individually and the marital STIPULATED JOINT MOTION AND AGREED community thereof, 10 ORDER CONTINUING PENDING DEADLINES Plaintiffs, 11 NOTE ON MOTION CALENDAR: April 20, 2020 12 ٧. 13 CITY OF RENTON, a municipal corporation; PUGET SOUND ENERGY, a Washington Clerk's Action Required 14 public utility corporation; and INFRASOURCE 15 SERVICES, LLC, a foreign limited liability company doing business in the State of 16 Washington; JOHN AND JANE DOE 1-25, individually and the marital communities 17 thereof; and DOE BUSINESS ENTITIES 1-25, unknown business entities, 18 19 Defendants. 20 This stipulated motion and agreed order is jointly brought by all of the named parties in 21 this case: Plaintiffs Sukhminder Kaur and Sartaj Singh Sohi ("Plaintiffs"); Defendant City of 22 23 24 25

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Renton ("Renton"); Defendant Puget Sound Energy ("PSE"); and Defendant InfraSource Services, LLC ("InfraSource") (collectively, the "Parties").¹

I. STIPULATED MOTION SEEKING CONTINUATION OF PENDING DEADLINES DUE TO UPCOMING MEDIATION

This action was removed from the State of Washington Superior Court to this Court on or about March 10, 2020. Dkt #2. This early in the action, of the three defendants, only InfraSource has filed a responsive pleading. Dkt #6. Renton and PSE each has not yet filed its responsive pleading. *See* Docket. Additionally, on April 8, 2020, this Court set the following pending initial disclosure and submittal deadlines in this action:

- Deadline for FRCP 26(f) Conference: May 6, 2020
- Initial Disclosures Pursuant to FRCP 26(a)(1): May 13, 2020
- Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local
 Civil Rule 26(f): May 20, 2020

Dkt #13.

Meanwhile, Plaintiffs and InfraSource have agreed to an early mediation in this action, with mediation scheduled with Judicial Dispute Resolution, LLC on May 20, 2020.

Accordingly, the Parties agree that all pending deadlines in this action should be continued to dates after the scheduled mediation; this will serve judicial economy, allow Plaintiffs and InfraSource to focus on preparing for mediation, further incentivize Plaintiffs and InfraSource to reach agreement through mediation, and spare all Parties from what may become unnecessary work.

The Parties respectfully propose the following continued dates:

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¹ Although the caption anticipates the identification of John Doe defendants and Doe Business defendants, no such defendants have yet been identified in this action.

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<u>Description</u>	<u>Current Deadline</u>	<u>New Deadline</u>	
Deadline for Renton and PSE to file responsive pleadings	21 days after service (See Dkts #11 and #12 for service dates)	June 3, 2020	
Deadline for FRCP 26(f) Conference	May 6, 2020	June 10, 2020	
Initial Disclosures Pursuant to FRCP 26(a)(1)	May 13, 2020	June 17, 2020	
Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f)	May 20, 2020	June 24, 2020	

II. AGREED ORDER

Based on the foregoing stipulated joint motion of the Parties, it is Ordered that the pending deadlines in this action are continued as set forth below:

<u>Description</u>	<u>New Deadline</u>
Deadline for Renton and PSE to file responsive pleadings	June 3, 2020
Deadline for FRCP 26(f) Conference	June 10, 2020
Initial Disclosures Pursuant to FRCP 26(a)(1)	June 17, 2020
Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f)	June 24, 2020

The Clerk shall update this action's docket to reflect these new deadlines.

DATED this _22nd_ day of _April__, 2020.

Marsha J. Pechman

United States Senior District Judge

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Presented by:
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     PLAINTIFFS:
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     By: <u>s/Brendan Vandor</u>
        Rodney L. Umberger, Jr., WSBA #24948
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Williams, Kastner & Gibbs PLLC 601 Union Street, Suite 4100 Seattle, WA 98101-2380 Attorneys for Defendant InfraSource Services, LLC

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CERTIFICATE OF SERVICE 1 I, STEPHANIE RARY, hereby certify that on April 20, 2020, I electronically filed the 2 foregoing with the Clerk of the Court using the CM/ECF system which will send notification of 3 such filing to the following: 4 5 **Attorney of Record for Plaintiffs:** James J. Dore, Jr 6 Dore Law Group, PLLC 7 1122 W James ST Kent, WA 98032 8 253-850-6411 Fax: 253-850-3360 9 Email: jim@dorelawpllc.com 10 **Attorney of Record for Defendant Puget Sound Energy** 11 Jeffrey M. Thomas 12 Gordon Tilden Thomas & Cordell, LLP One Union Square 13 600 University Street, Suite 2915 Seattle, WA 98101 14 206-467-6477 15 Email: jthomas@gordontilden.com 16 **Attorneys of Record for Defendant Infrasource Services LLC:** 17 Rodney L. Umberger, Jr. **Brendan Thomas Vandor** 18 Williams, Kastner & Gibbs PLLC 19 601 Union Street, Suite 4100 Seattle, WA 98101 20 206-628-6600 Email: rumberger@williamskastner.com 21 Email: bvandor@williamskastner.com 22 DATED, this 20th day of April, 2020. 23 s/Stephanie Rary 24 Stephanie Rary 25